

MOSER LAW FIRM, PC



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September 27, 2024

**VIA ECF**

Hon. Anne Y Shields, USMJ  
United States District Court, EDNY  
100 Federal Plaza  
Central Islip, NY 11717

Re: *Yanes v Nilkhant 2 Car Wash (FLSA)*, Case No. 23-cv-09454

Dear Judge Shields:

I represent the Plaintiff Liliana Yanes. By this letter the parties jointly move for an amendment of the scheduling order which was so-ordered on July 30, 2024. The reason for this request is that the attorney for the defendants had a recent health emergency. This is the first request for an extension.

The parties request that the dates be extended as follows:

	Original Date	New Date
Defendants to Respond to Plaintiff's Interrogatories and RFPS dated July 19, 2024	8/23/2024	10/11/2024
Completion of Depositions	9/21/2024	11/22/2024
Requests for Admissions and Supp Discovery Requests to be Served	10/15/2024	12/13/2024
Responses to Requests for Admissions and Supp Discovery Requests to be Served	12/15/2024	1/17/2025
Date for Completion of All Fact Discovery	11/29/2024	1/31/2025
Deadline to file Pre-Motion Letter re Dispositive Motions	12/31/2024	2/28/2025

The parties do not anticipate the need for expert discovery.

Respectfully Submitted,

*Steven J. Moser*

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CC: All counsel of record via ECF